



Land and Chemicals Division
RCRA Branch
Inspection Letter Signoff

Type of Document: ☐ Notice of Violation and Inspection Report/Checklist
☒ No Violation Letter and Inspection Report/Checklist
☐ Letter of Acknowledgment
☐ Information Request
☐ Return to Compliance

Facility Name and Location and Id:

US Motor Recycling
ILR 000 146 332

Assigned Staff:

J KRIZ

Phone:

3/6057

Name	Signature	Date
Author	<i>James M. Kriz</i>	40/6/09
Regional Counsel	—	—
Section Chief	<i>James M. Kriz</i>	10/7/09
Branch Chief	<i>William H. Harris</i>	10/20/09

RT
MG
10/7

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
 - One copy for the assigned staff;
 - One copy for the section file; and
 - One copy for the official file; Note: original inspection report goes into file room.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

LR-8J

OCT 27 2009

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Buddy Cohen
Site Manager
U.S. Motor Recycling Incorporated
4027 S. Wells Avenue
Chicago, Illinois 60609

Re: Compliance Evaluation Inspection
EPA I.D. No.: ILR 000 146 332

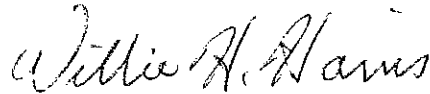
Dear Mr. Cohen:

On September 1, 2009, a representative of the U. S. Environmental Protection Agency inspected the U.S. Motor Recycling Incorporated (U.S. Motor) facility located at 4027 S. Wells Avenue in Chicago, Illinois. The purpose of the inspection was to evaluate U.S. Motor's compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, the Standards Applicable to Generators of Hazardous Waste set forth at 40 CFR Part 262 and Part 265, respectively. Enclosed, please find a copy of our inspection report.

As of this writing, based upon information available to EPA, our review of the inspection has not resulted in the detection of violations of any of the specific RCRA requirements under evaluation. This determination does not limit the applicability of the requirements evaluated, other RCRA regulations, or regulations under other environmental statutes. EPA and the Illinois Environmental Protection Agency will continue to evaluate U.S. Motor in the future.

If you have any questions or concerns regarding this matter, please contact Judith Kriz, of my staff, at (312)-353-6057.

Sincerely,

A handwritten signature in cursive script that reads "Willie H. Harris".

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

Enclosure

cc: Todd Marvel, Illinois Environmental Protection Agency

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA Branch, LR-8J
77 W. JACKSON BLVD.
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: U.S. Motor Recycling Incorporated

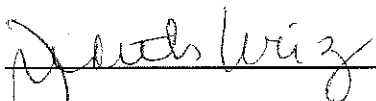
EPA ID NUMBER: ILR 000 146 332

ADDRESS: 4027 S. Wells Ave.
Chicago, IL 60609

DATE OF INSPECTION: September 1, 2009

EPA INSPECTOR: Judith Kriz

PREPARED BY:

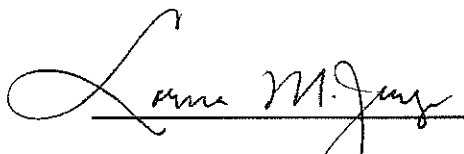


Judith Kriz
Chemist
Compliance Section 1,
RCRA Branch

Date

10/6/09

REVIEWED BY:



Lorna M. Jereza, Chief,
Compliance Section 1
RCRA Branch

Date

10/14/09

Purpose of Inspection

This unannounced inspection was an evaluation of U.S. Motor Recycling Incorporated (US Motor's) compliance with hazardous waste regulations found at 35 IAC §722 and §725 and the Code of Federal Regulations (CFR) 40 CFR §§262 and 265. The inspection was a routine RCRA Compliance Evaluation Inspection (CEI).

Participants

Judith Kriz, U.S. EPA

Site Representative:

Buddy Cohen

Site Owner

Introduction

I arrived at the site at approximately 9:00 a.m. I introduced myself, presented my inspector credentials and identification to Buddy Cohen, and described the purpose of the inspection and the process by which I intended to conduct the inspection. At that point, he agreed to admit me. Mr. Cohen was confused as to the purpose of my inspection, since he stated that US Motor has never generated any hazardous waste, and did not know that his facility had notified as a Large Quantity Generator (LQG).

Prior to the inspection, I had researched the site information which indicated that a notification was received by Illinois Environmental Protection Agency (IEPA) on April 17, 2007, listing the site as a LQG.

Site Description

The Chicago site of US Motor is a large fenced-in open area, with 24-hour security. Mr. Cohen was adamant that they generated no hazardous waste and worked with no solvents. He stated that the facility has been at this site since 1948, and receives electrical motors (e.g., from appliances). Motor with circuit boards are not accepted, nor are any computers or cathode ray tubes (CRT's). Also, plastics are returned to the original shipper.

Site Tour

We first inspected the yard, where motors had been dumped. This area encompasses several acres. The motors were inspected and classified manually by employees. US Motor combines the motors, which have value for the copper components, and places them in half-size shipping containers which were observed on-site. The containers are then shipped to mainland China, which purchases the shipments for the copper and processes the motors further.

The facility had previously utilized a baler and a shredder but these were dismantled several years ago. No evidence of any staining was observed on the soil, nor were any drums or containers of solvents or other chemicals observed on the site.

Records Review

Since the facility does not generate hazardous waste, no manifests were available on-site.

When I returned to the office, I researched the background of the 2007 notification by the facility. I contacted IEPA to determine if they had any additional information. Hope Wright checked filings, and determined that US Motor's consultant, SET Environmental (SET), had submitted the April 2007 notification due to the discovery early that year of a leaking underground storage tank (LUST) which had contained gasoline. The facility was an LQG for 2007 due to the quantity of BTEX contaminated soil which was properly managed and manifested. SET filed an annual report with IEPA in early 2008, indicating that the facility was an LQG in 2007, but in the future would be a non-generator. I advised Mr. Cohen of this information, and he then remembered the incident.

Closing Conference

I summarized the observations made during the inspection, and advised that the RCRA ID number issue would be researched.

Attachments

A. Photographs

ATTACHMENT A

Photographs



Date: September 1, 2009

Location: US Motor Recycling, 4027 S. Wells Avenue, Chicago, Illinois 60609

Photographer: Judith Kriz, Region 5, RCRA Branch, Compliance Section 1

Camera: Olympus Stylus 600, 6.0 megapixel

Description of photograph: This photograph was taken facing east. Note the motors, which are free of plastics and other materials. These motors are typical of those on all areas of the site.



Date: September 1, 2009

Location: US Motor Recycling, 4027 S. Wells Avenue, Chicago, Illinois 60809

Photographer: Judith Kriz, Region 5, RCRA Branch, Compliance Section 1

Camera: Olympus Stylus 600, 6.0 Megapixel

Description of photograph: This photograph was taken facing west, indicating more of the motors received by the facility as well as some of the material moving equipment.